

MCLAUGHLIN & STERN, LLP

FOUNDED 1898

DANIEL J. HORWITZ
Partner
dhorwitz@mclaughlinstern.com
(212) 455-0448

260 MADISON AVENUE
NEW YORK, NEW YORK 10016
(212) 448-1100
FAX (212) 448-0066
www.mclaughlinstern.com

GARDEN CITY, NEW YORK
MILLBROOK, NEW YORK
WESTPORT, CONNECTICUT
WEST PALM BEACH, FLORIDA
NAPLES, FLORIDA

January 22, 2021

VIA ECF

Honorable Denise L. Cote, U.S.D.J.
Daniel Patrick Moynihan, United States Courthouse
500 Pearl St., Courtroom 15B
New York, NY 10007-1312

MEMO ENDORSED

Re: Knopf v. Esposito et al., 17-CV-5833-DLC

Dear Judge Cote,

We represent non-party Melissa Ringel. Pursuant to this Court's January 4, 2021 Order and this Court's Individual Practices, we respectfully move this Court for approval to redact and concurrently file under seal Ms. Ringel's response to Plaintiffs' January 19, 2021 letter requesting "an order overruling" Ms. Ringel's invocation of the Fifth Amendment at her December 14, 2020 deposition in this matter [ECF 275] ("Plaintiffs' Letter Motion"). Plaintiffs' motion to seal Plaintiffs' Letter Motion [ECF 279] argued that good cause exists to file their motion to compel deposition testimony from Melissa Ringel under seal and to permit a redacted version of the motion to be filed publicly. This Court approved Plaintiffs' motion to seal [ECF 284]. Ms. Ringel seeks approval of the redactions to and sealing of her response to Plaintiffs' Letter Motion because Ms. Ringel's response will include references to Plaintiffs' Letter Motion, a document that is filed under seal, and reference the concern that was the basis for the cited good cause in Plaintiffs' motion to seal. Ms. Ringel has complied with Your Honor's Individual Rule 4(D) and Rule 8.

For the above reasons, Ms. Ringel respectfully requests that the Court grant Ms. Ringel's application to redact and concurrently file under seal her response to Plaintiffs' Letter Motion.

The motion to redact is granted with respect to the second highlighted sentence starting with "Here" and footnote 2. The motion is otherwise denied.

By January 26, 2021, Melissa Ringel shall file a redacted version in public view in accordance with this memorandum endorsement.

1.25.2021


DENISE COTE

United States District Judge

Respectfully submitted,

/s/ Daniel J. Horwitz

Daniel J. Horwitz
McLaughlin & Stern LLP
260 Madison Avenue
New York, NY 10016
(212) 448-1100
dhorwitz@mclaughlinstern.com
Counsel for Third-Party Witness Melissa Ringel